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March 8, 2019

Ms. Sarah Rolfes
Remedial Project Manager
United States Environmental Protection Agency
77 Jackson Blvd.
Chicago, IL 60604

RE: Response to Comments on Removal Action Work Plan
Division Street Station, North Branch Site
Chicago, Illinois
The Peoples Gas Light and Coke Company
CERCLA Docket No. V-W-08-C-917, Site Spill ID – B5FZ
CERCLIS ID – ILD982074783

Dear Ms. Rolfes:

This letter provides responses to United States Environmental Protection Agency (USEPA) comments issued February 21, 2018 on the Removal Action Work Plan – Revision 0 (RAWP) for a portion of the Division Street Station Former Manufactured Gas Plant (MGP) Operable Unit 1 of The Peoples Gas Light and Coke Company's (PGL) North Branch Site. The enclosed Removal Action Work Plan – Revision 1 incorporates the responses to these comments, as presented below.

Agency Comment 1: *There are several references in the Work Plan and associated figures to engineered barriers, including a reference to a concrete engineered barrier. As detailed in the Work Plan, previous remedial activities occurred under the Illinois Environmental Protection Agency's (Illinois EPA) Voluntary Site Remediation Program (SRP) and barriers were placed over portions of the property. Please provide further information regarding these barriers, including any data that necessitated the original placement/need for the barriers. For reference, it appears that there were no borings advanced near the engineered barrier along the southwest border of the parcel. Additionally, please provide further information regarding how the soil will be screened in this area and if confirmation samples will be collected along the wall of the excavation to delineate potential contamination. If potential contamination is found along the property boundary, please indicate if any action will occur during this removal action.*

PGL Response: Previous excavations and engineered barrier placement were proactively implemented to ensure three feet of clean soil or an asphalt/concrete barrier was present throughout the entire site. This effort consisted of excavating unpaved areas to three feet and backfilling with imported coarse aggregate backfill. Confirmation samples were not collected from all barrier locations.

Regarding contamination along the property boundary, soil beneath all excavation areas as well as sidewalls will be sampled in accordance with Section 6.4 of the RAWP. If impacts are present along the boundary of the removal action area, these impacts will be managed as part of the Remedial Investigation (RI)/ Feasibility Study (FS) process.

Agency Comment 2: *Please provide an updated figure detailing the layout for the site during the proposed removal action, including the construction entrance, possible truck routes, and proposed laydown area.*

PGL Response: Figure showing the laydown area, construction gate, and truck route is provided as Figure 15.

Agency Comment 3: *There are several references throughout the document to facilitating Illinois EPA closures under the SRP program. There should also be references in the document concerning satisfying the requirements of the CERCLA SAS program.*

PGL Response: The references have been adjusted to reflect that the objective of removal of source material and installation of direct contact barriers is to mitigate risk rather than address Illinois Tiered Approach to Corrective Action Objectives (TACO) criteria. Closure under the Superfund Alternative Sites (SAS) Program will be completed as part of the ongoing RI/FS activities.

Agency Comment 4: *The second full paragraph of Section 3.1 states that "non-MGP related sources are not expected to be encountered within the RAA". However, based on prior sampling at the site, especially near the current maintenance building, there is a documented presence of chlorinated VOC compounds in the subsurface, which are not typical MGP COPCs. According to past investigation reports, the following chlorinated VOCs (CVOCs) have been detected above multi-site vapor screening levels: bromodichloromethane, chloroform, dibromochloromethane, 1,4-dichlorobenzene, 1,1-dichloroethane, tetrachloroethene, trichloroethene, and vinyl chloride. EPA suggests screening and analyzing the RAWP data for the above listed compounds as part of this action. This will be most important at the deeper excavations proposed to be conducted during Phase 3 removal efforts extending up to 20 feet bgs. These compounds should be added to Table 3 and Table E of the RAWP.*

PGL Response: Although the focus of this RAWP is to address MGP-related contaminants, PGL has modified the RAWP to include the above chlorinated compounds as constituents of potential concern (COPCs), as indicated in Section 3.1. Note that the RAWP Revision 1 COPC list has been updated as discussed in Response to Comment 9.

Agency Comment 5: *Please remove references to the USEPA On-Scene Coordinator. Since this action is being taken voluntarily, no OSC will be assigned to the site. As appropriate, the EPA Remedial Project Manager, or a designated representative, would be notified of any concerns.*

PGL Response: References to *USEPA On-Scene Coordinator have been replaced with USEPA Remedial Project Manager.*

Agency Comment 6: *In Section 3.2 the first bullet appears to be incomplete. Please confirm that the Table A descriptions represent MGP source material that will be targeted for removal, if encountered.*

PGL Response: The first bullet has been revised for clarity. Table A summarizes visual observations of source material that will be removed. In addition, exceedances of site-specific soil attenuation capacity and soil saturation limit will be considered source material and be removed, as presented in Tables 2 and 3.

Agency Comment 7: *The bullet in Section 3.3, references "un-affected" native material. Please provide further information concerning how "un-affected" native material will be defined and determined.*

PGL Response: Section 3.3 has been revised to describe unaffected native as material absent of source material (as described in Table 2) or inhalation exceedances (as described in Table 3).

Agency Comment 8: *As referenced in a previous comment, remedial actions have previously occurred on portions of the parcel. The third bullet in Section 3.3 indicates that three feet of surface soil will be removed from the entire RAA. Please clarify if the intent during this remedial action to remove three feet of surface soil across the entire RAA, or only in areas that did not previously have a remedial action. If areas that previously had remedial actions are to be left in place, please provide information on how these areas will be determined in the field (i.e., using surveyed coordinates, etc.).*

PGL Response: The intent of this removal action is to avoid previously excavated locations, to the extent it is logistically possible. Survey coordinates will be used as initial line of evidence to determine the boundary between proposed excavations and historic excavation. Excavation activities will continue until encountering the granular backfill material used during previous activities, which visually contrasts with general site fill. Section 4.3.2.2 has been updated, accordingly.

Agency Comment 9: *Section 3.3 includes a reference to "removing Illinois TACO Tier 1 soil inhalation exceedances for MGP COPCs". Please indicate if Table 3 will be utilized for screening purposes and update this section as appropriate, including references as necessary. The information should also include whether the full set of industrial/commercial and construction worker values listed in 35 IAC Part 742, Appendix B, Table B will be used and a justification if only construction worker values will be used. Please specify whether any soil gas, air, or groundwater samples will be collected to evaluate detected concentrations against the TACO criteria for indoor and outdoor vapor exposures, or if any soil gas or air samples are proposed for use in the EPA Vapor Intrusion Screening Level (VISL) Calculator.*

PGL Response: Section 3.3 has been updated with a reference to Table 3, which includes industrial/commercial inhalation-based criteria. Previous investigations had included the broad set of parameters included in *35 IAC Part 742,* Appendix B, Table B. Based on the frequency of detections and exceedances, the broad parameter list was systemically reduced to develop a site-specific COPC list, as presented in the Site-Specific Work Plan (SSWP) Addendum 1, Revision 1 (Natural Resource Technology, 2012). This site-specific COPC list will be used is now included as the confirmation sampling parameter list in Section 6.4.2 and Table 3. It should be noted that although bromodichloromethane, chloroform, dibromochloromethane, and vinyl chloride were not included as site-specific COPCs in SSWP Addendum 1, they have also been added to the Table 3 confirmation sampling parameter list based on Comment 4. The remaining parameters mentioned in Comment 4 had been included as SSWP Addendum 1 site-specific COPCs and remain on Table 3.

Soil gas samples have been completed at existing buildings, most of which will be demolished as part of removal action and redevelopment. Affected soil beneath the proposed building will be removed as part of this removal action. Post removal action conditions will be evaluated in accordance with the USEPA-approved Vapor Intrusion (VI) Decision Matrix during the RI/FS Process.

Agency Comment 10: *Section 3.3 states that a pre-removal action investigation is proposed to address identified data gaps. The data gaps are not identified anywhere in the RAWP. Please provide further information concerning the pre-removal action investigation.*

PGL Response: The primary purpose of the pre-removal action investigation is to inform development of the site-specific soil attenuation capacity. In addition, borings will be advanced in deep excavation areas associated with Phase 3 to inform excavation footprints. The investigation is shown on Figure 13 and described in Section 3.3.

Agency Comment 11: *EPA recommends that if a pre-removal action investigation is going to be completed, limited sampling along the border of the site may help facilitate field construction efforts and provide advanced notification if any areas of potential off-site migration are observed.*

PGL Response: PGL will collect confirmation samples during excavation along the boundary of the site. If off-site migration is observed or side wall sampling exceeds criteria, these locations will be managed as part of the RI/FS process, as addressed in Section 6.4.2 of the RAWP.

Agency Comment 12: *Excavation limits across the existing gas holder are currently proposed for various depths, ranging from 3 feet below ground surface to 10 feet below ground surface.*

Additionally, some of the work within the foundation of the gas holder is expected to occur in Phase 2 and the remainder in Phase 3. Please provide further information regarding the excavation planned for the gas holder, including whether or not the structure will be removed.

PGL Response: During Phase 2 excavation work, the western portion of the holder will be removed. PGL intends to use the information gathered about the presence of subsurface impacts during Phase 2 of the removal action to determine if removal of the holder in Phase 3 area is necessary, as addressed in Section 4.3.2.2.

Agency Comment 13: *Please clarify if the screening criteria for determining potential use of overburden soils as backfill below 3 feet will include all of the values listed in 35 IAC Part 742, Appendix B, Table B. Section 3.1 and Section 4.3.2.3 do not specify whether the TACO Soil Component of the Groundwater Ingestion Route (SCGIR) will be considered. In particular, the placement of overburden soils at depths as deep as 10 feet below ground surface may come into contact with groundwater. Please provide more clarity on how TACO criteria will be applied. This same comment applies to Section 6.4.2 and Table E.*

PGL Response: Overburden soil is no longer intended for use as post-remediation backfill. The soil component of groundwater will be evaluated through monitoring well results following removal action implementation. Historic groundwater monitoring conducted as part of the RI/FS has not indicated exceedances of site-specific groundwater screening levels used for the RI/FS in this portion of the site.

Agency Comment 14: *Section 4.3.4 indicates that limited dewatering is expected, and that dewatering fluid will be transported by trucks for off-site treatment and disposal. EPA suggests that during the pre-removal action investigations additional borings are advanced to determine if any of the areas remediated previously with larger aggregate stone are holding significant water to facilitate field construction efforts.*

PGL Response: Field logging of soil classification from pre-removal action investigations will be recorded for use in estimating likely number of holding tanks and frequency of off-site hauling. Off-site disposal of water is proposed for Phase 2, due to limited excavation depths. PGL intends to use information gained from Phase 2 to inform the water management approach for Phase 3. Section 5.2 has been updated, accordingly.

Agency Comment 15: *Section 6.1 indicates that background air monitoring is proposed for 3 days per week to establish baseline concentrations. Please provide further rationale for the duration selected. Please also detail if these will be 3 consecutive days and the number of weeks proposed.*

PGL Response: The approach for background monitoring is consistent with previously completed USEPA removal actions, including PGL Crawford. Three days of sampling is the minimum number required to capture a range background conditions. At a minimum, background samples will be completed over the course of one week. Consecutive days are not required for background sampling and exact days of background sampling will be selected to best represent background conditions, when considering weather and other activities at the site.

Agency Comment 16: *Section 6.1.2 indicates full-scale startup sampling indicates that during the first two weeks of full-scale operation, 24-hour summa and PUF samples will be collected. Please provide a detailed definition of full-scale operation (i.e., when excavators begin working, or perhaps when known MGP material will be excavated). Full-scale sampling indicates that during the remainder of the construction work, PUF samples will be collected for one day a week and summa samples will be collected for two days a week. Please provide a rationale for this approach to sampling for the remainder of the removal action. EPA suggests that if the full-scale startup samples come back no exceedances of the AACs, then a plan for ramping down the frequency of samples be implemented.*

PGL Response: Our definition of "full-scale start up" is the first two weeks of site operations that involve excavation and offsite disposal of MGP-affected soil. As indicated in the comment, PGL intends to reduce sampling frequency following startup operation to confirm attainment of AACs. Text has been modified to indicate that the reduction in monitoring will be associated with documented attainment with the AACs. Text has also been modified to indicate that when transitioning to new excavation areas that are suspected to contain greater visual impacts or cause higher readings on real-time monitoring instruments, frequency of PUF and Summa samples may temporarily increase. Section 6.1.2 has been updated, accordingly.

Agency Comment 17: *The Action Levels proposed in Table C are based on the action levels utilized at the PGL Crawford Site, which were developed in 2012. Please provide further information regarding the predicted compliance with the AACs that has been demonstrated at the PGL Crawford Site.*

PGL Response: The Action Levels proposed at Division are consistent with those approved by USEPA for use at PGL Crawford. Use of these action levels at PGL Crawford has been effective at preventing exceedances of the AACs. The AACs at PGL Crawford are lower than the AACs at Division, due to the longer duration of the PGL Crawford project. Accordingly, incorporating the Action Levels from PGL Crawford at Division is a conservative selection. As indicated in Section 6.1.5, Action Levels at Division may be refined during full-scale operations if a better correlation between Action Levels and Division AAC can be developed.

Agency Comment 18: *The RAWP indicates in Section 6.2 that mitigation measures for fugitive dust include foam applications, covering stockpiles, and arranging the site layout in such a manner to keep stockpiles away from potential receptors. Section 4.4 indicates water may be utilized to control fugitive dust emissions from stockpiles, excavated areas, etc., in addition to the application of foam and covers. Section 6.2 should be updated to include the application of water to be consistent with Section 4.4 if it will indeed be used.*

PGL Response: Table D of Section 6.2 has been updated to include application of water for dust/odor control.

Agency Comment 19: *Please clarify the source of the screening criteria listed in Appendix A, Table A, especially the row of blue text for "Soil TPAH, BAP TEQ, Csat, and ceiling SLs". The listed values for 1,1,1-trichloroethane are all 640 mg/kg, but no such values exist for this compound in the TACO Appendix B, Table B values, nor is it the TACO Csat value listed in Appendix A, Table A of TACO. This compound is also not listed in the August 2017 risk assessment framework (RAP) (Rev 6). Similarly, please clarify the source of the benzene screening value of 1,820 mg/kg. Please verify that all screening criteria are consistent with the most recent RAP (Rev 6).*

PGL Response: Appendix A, Table A was developed consistent with the USEPA-approved Risk Assessment Framework, which is a composite of USEPA RSLs and IEPA TACO criteria. Based on Comment 20, this table has been replaced with a table that also includes TACO Ingestion and Inhalation values for industrial/commercial use.

Agency Comment 20: *Please clarify the intended use of Appendix A, Table A in the RAWP, as many of the screening values in Appendix A, Table A do not appear to be derived from TACO and the RAWP appears to be targeting removal values that will meet Illinois EPA TACO criteria. As an example, Table A currently includes a screening value of 5.1 mg/kg which is listed as the IL Industrial soil screening level (SL) for benzene. However, a review of the most recent Multi-Site Risk Assessment Framework (RAP) and the TACO industrial/commercial values in TACO Appendix B, Table B show that the TACO industrial/commercial inhalation screening criteria for benzene is 1.6 mg/kg, which is listed in Table 3 of the RAWP text. It appears that the criteria being used as a basis for the soil removal are not necessarily reflected in the screening tables presented in Appendix A, Table A. Please consider adding all applicable screening criteria that will be applied to the RAWP*

efforts to Appendix A, Table A. A figure detailing the exceedances of RAWP-specific removal criteria may help guide removal efforts to meet the desired criteria.

PGL Response: Appendix A, Table A is the table traditionally included in PGL's RI reports to summarize exceedances screening levels developed in the USEPA-approved Risk Assessment Framework. The removal action will also take into consideration IEPA TACO ingestion and inhalation criteria. Accordingly, Appendix A, Table A has been updated to include IEPA TACO ingestion and inhalation criteria.

Agency Comment 21: *Appendix C indicates that a project duration of 34 weeks was utilized to develop the averaging time for the calculation of the AACs for the site. Please review the schedule for construction in Section 7.1 and indicate why a duration reflecting the entire construction, including the building was not utilized.*

PGL Response: The 34-week duration in the AAC is intended to capture the duration of intrusive activities for Phase 2 and 3 work, during which potential for off-site emissions associated with the former MGP are possible.

Agency Comment 22: *Please provide the anticipated locations of the perimeter air-monitoring equipment that will be utilized during the removal action.*

PGL Response: The proposed air monitoring locations are provided as Figure 16.

Agency Comment 23: *There are two blank rows in the Parameter column of Table 2, based on the list provided in Table E 1,3,5-trimethylbenzene and 2,4-Dimethylphenol are missing. Please update the table accordingly.*

PGL Response: Table 2 has been updated to include missing text. Note 2,4-Dimethylphenol was removed as a result of the transition to the SSWP Addendum 1 COPC list discussed in response to comment 9.

If you have any questions regarding the content of this letter or wish to discuss this matter further, please do not hesitate to contact me at (312) 240-4569 or Narendra.Prasad@WECEnergyGroup.com.

Regards,

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Principal Engineer – Environmental

Enclosures: Removal Action Work Plan – Revision 1

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